UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

PROMESA Title III

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, et al.

This filing relates to the Commonwealth, HTA and ERS.

MOTION FOR EXTENSION OF TIME TO OPPOSE ONE HUNRED THIRTY-SIXTH OMNIBUS OBJECTION

To the Honorable Laura Taylor Swain, United States District Judge:

COMES NOW Luis Serrano-Cedeño (hereinafter "Serrano"), through the undersigned counsel, and respectfully states and prays as follows:

- Serrano informs that his correct mailing address is: Urb. Los Maestros, 69 Calle Francisco Pietri, Adjuntas, PR 00601. His telephone number is 787-901-1646 and his email address is berdielb@gmail.com.
- 2. On June 29, 2018 Berdiel filed a proof of claim in the instant case. His claim was identified as number 136061.
- 3. On January 14, 2020 the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (collectively "Debtors"), by and through the Financial Oversight and Management Board for Puerto Rico ("Oversight Board") filed a motion entitled *One Hundred Forty-Seventh Omnibus Objection (Non Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and*

Employees Retirement System of the Government of the Commonwealth of Puerto Rico to

Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes ("the

Omnibus Objection").

4. The Omnibus Objection contends that Serrano's, and many others', proof of claims are

deficient, and therefore should be disallowed.

5. Debtor's further claim that, prior to the filing of the Omnibus Objection, they sent a letter to

Serrano requesting additional information, and that he should respond by October 23, 2019.

6. Serrano represents that he did not receive the aforementioned letter, hence he failed to

respond by the October 23 deadline.

7. Nevertheless, Serrano intends to provide additional information, and/or oppose the Omnibus

Objection.

8. Serrano is in the process of obtaining the necessary documentation to better assert his claim

against Debtors, but has been unable to do so. As such, he is requesting until Monday

February 24, 2020 to furnish additional information, and/or oppose the Omnibus Objection.

WHEREFORE, Serrano requests that the Court grant the requested extension.

I HEREBY CERTIFY: that I electronically filed the foregoing with the Court using the

CM/ECF system which will send automatic notification of such filing to the attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of February, 2020.

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s/Félix A. Colón-Serrano Félix A. Colón-Serrano, Esq.

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